

JENNER & BLOCK LLP

Reid J. Schar (*pro hac vice*)

RSchar@jenner.com

353 N. Clark Street

Chicago, IL 60654-3456

Telephone: +1 312 222 9350

Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP

Kate Dyer (Bar No. 171891)

kdyer@clarencedyer.com

899 Ellis Street

San Francisco, CA 94109-7807

Telephone: +1 415 749 1800

Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP

Kevin J. Orsini (*pro hac vice*)

korsini@cravath.com

825 8th Avenue

New York, NY 10019

Telephone: +1 212 474 1000

Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO REQUEST FOR
INFORMATION ON PSPS**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company ("PG&E") respectfully submits this response to the Court's October 14, 2019 request for information on the Public Safety Power Shutoff that occurred from October 9 to October 12, 2019 (the "October 9-12 PSPS"). Specifically, the

1 Court requested that PG&E indicate how many trees and limbs fell or blew onto the deenergized
 2 lines as well as the number of infrastructure failures identified during the post-PSPS patrols and, for
 3 each, how many of those tree or branch strikes or infrastructure failures likely would have caused
 4 arcing had the lines been energized. PG&E provides that information below.

5 As an initial matter, PG&E wants to acknowledge the hardship that the October 9-12
 6 PSPS as well as ongoing PSPS events have caused for the millions of people affected, and assures
 7 the Court that it intends to continue working with all key stakeholders to minimize, to the extent
 8 possible, the hardship caused by these PSPS events. In addition, PG&E notes that the information
 9 provided herein was collected in connection with the patrols that PG&E conducted of the 25,000 line
 10 miles that were included in the October 9-12 PSPS. These patrols were conducted to assess whether
 11 the lines were safe to re-energize, including whether line or equipment repairs were necessary before
 12 the lines could be re-energized. PG&E also notes that its ability to provide the Court with
 13 information about how many line strikes (from trees, branches or infrastructure failures) would have
 14 caused arcing involves some amount of speculation and is based on PG&E's best view based on
 15 factors such as the vegetation's location and the damage the vegetation or infrastructure failure
 16 appears to have caused.

17 Against that background, with respect to the tree or limb strikes, PG&E identified 74
 18 instances of vegetation damage that appear to have occurred during the October 9-12 PSPS (*e.g.*, a
 19 tree branch laying across a power line).¹ PG&E's current information with respect to these 74
 20 instances is that:

- 21 • 44 instances of vegetation damage likely would have caused arcing if the lines
 22 had been energized based on PG&E's assessment of whether the vegetation

23
 24 ¹ During the post-PSPS patrols, PG&E identified vegetation issues that may have pre-dated the
 25 October 9-12 PSPS (*e.g.*, vegetation that was within the applicable clearance zones). These issues
 26 are not included as part of the 74 instances of vegetation damage discussed above. PG&E addressed
 27 each of these issues prior to re-energizing its lines. PG&E's information about these issues is
 28 preliminary, but it will provide additional information to the Court once it is available. PG&E notes,
 however, that it may be delayed in doing so in view of the ongoing PSPS events, which require
 significant resources to ensure the timeliness of decision-making, the re-energization of power lines
 and that customers get the support they need before, during and after the shutdowns.

was contacting or had contacted the conductor (*e.g.*, a tree branch is laying on two phases of a conductor);

- 25 instances of vegetation damage likely would not have caused arcing (*e.g.*, the conductor was insulated); and
- with respect to 5 instances of vegetation damage, PG&E is unable to determine whether arcing likely would have occurred.

Each of the 44 locations where vegetation damage occurred that likely would have caused arcing is identified by county and coordinates on Exhibit A, attached herewith. Exhibit A also includes information regarding the date of the most recent vegetation management work at each of the locations where arcing likely would have occurred.

PG&E identified 41 instances of damage to its infrastructure that appear to have been caused by extreme wind and/or other fire conditions present during the October 9-12 PSPS (*e.g.*, a broken tie wire (the equipment connecting the insulator to the conductor)).² PG&E's current information with respect to these 41 instances is that:

- 12 instances of infrastructure damage likely would have caused arcing based on PG&E's assessment of the location of the damaged equipment (*e.g.*, two phases of conductor made contact);
- 26 instances of infrastructure damage likely would not have caused arcing (*e.g.*, the conductor was insulated) ; and

² During the post-PSPS patrols, PG&E identified equipment issues that may have pre-dated the October 9-12 PSPS (*e.g.*, a crack in a cross arm that may not have been caused by extreme wind). PG&E also identified two instances of damage to infrastructure that is owned and operated by third parties. These issues are not included as part of the 41 instances of infrastructure damage discussed above. PG&E addressed each of these issues prior to re-energizing its lines. PG&E's information about these issues is preliminary, but it will provide additional information to the Court once it is available. PG&E notes, however, that it may be delayed in doing so in view of the ongoing PSPS events, which require significant resources to ensure the timeliness of decision-making, the re-energization of power lines and that customers get the support they need before, during and after the shutdowns.

- with respect to 3 instances of infrastructure damage, PG&E is unable to determine whether arcing likely would have occurred.

Each of the 12 locations where infrastructure damage occurred that likely would have caused arcing is identified by county and coordinates on Exhibit B, attached herewith. Exhibit B also includes information regarding the date of the most recent inspection or patrol of the equipment at each of the 12 locations where arcing likely would have occurred.³

Respectfully Submitted,

Dated: October 30, 2019

JENNER & BLOCK LLP

By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

³ A patrol is a simple, visual inspection of applicable overhead and underground facilities to identify obvious structural problems and hazards. Distribution patrols must be performed annually in urban areas, and every other year in rural areas, unless the area has been inspected in that year. All transmission line facilities are patrolled annually, but a detailed inspection (described below) may supplant an annual patrol if performed that year. A patrol of overhead lines may be performed by walking, driving or helicopter.

An inspection is a careful examination of individual components, structures and equipment through visual observation, and/or routine diagnostic tests in order to identify abnormal conditions that adversely impact safety or reliability. PG&E performs inspections of distribution lines every five years. For transmission facilities, detailed inspection frequencies vary depending on voltage, structure type (wood or steel), and foundation location relative to Bay waters.

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By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

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